

PILLSBURY WINTHROP SHAW PITTMAN LLP
MICHAEL CHIBIB, P.C. (admitted *pro hac vice*)
michael.chibib@pillsburylaw.com
401 Congress Ave., Suite 1700
Austin, TX 78701-3797
Telephone: 512.580.9609
Facsimile: 512.580.9601

PILLSBURY WINTHROP SHAW PITTMAN LLP
JEFFREY D. WEXLER (SBN 132256)
jeffrey.wexler@pillsburylaw.com
TIMOTHY RAWSON (SBN 304755)
tim.rawson@pillsburylaw.com
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: 213.488.7100
Facsimile: 213.629.1033

Attorneys for Plaintiff and Counterdefendant UM
CORPORATION and Counterdefendants GOLDEN
MEDIA GROUP, INC. and TIGA
ENTERTAINMENT COMPANY, LTD.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UM CORPORATION, a Japanese
corporation,

Plaintiff,

v.

TSUBURAYA PRODUCTIONS CO.,
LTD., a Japanese corporation,

Defendant.

Case No. 2:15-cv-03764-AB (AJWx)

**DECLARATION OF TIMOTHY
RAWSON IN SUPPORT OF
PLAINTIFF AND
COUNTERDEFENDANT UM
CORPORATION'S OBJECTIONS
TO DECLARATION OF TOSHIAKI
HIMURA IN SUPPORT OF
DEFENDANT AND
COUNTERCLAIMANT
TSUBURAYA PRODUCTIONS CO.
LTD.'S MOTION FOR SUMMARY
JUDGMENT [Dkt. 139]**

Date: July 24, 2017
Time: 10:00 a.m.
Location: Courtroom 7B

AND RELATED CROSS-CLAIMS

Motion Hrng. Cutoff: July 24, 2017
Pretrial Conf.: October 16, 2017
Trial: November 7, 2017

DECLARATION OF TIMOTHY RAWSON

I, Timothy Rawson, declare:

1. I am an attorney licensed to practice law in the State of California and am a member of the bar of this Court. I am an associate at the law firm of Pillsbury Winthrop Shaw Pittman LLP, attorneys of record for plaintiff and counterdefendant UM Corporation (“UMC”) and counterdefendants Golden Media Group, Inc. and TIGA Entertainment Company, Ltd. in this action. Unless indicated otherwise, I have personal knowledge of the following facts, and if called as a witness I could and would testify competently to those facts.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition of Judge Toshiaki Iimura, one of the two purported experts on Japanese law designated by defendant and counterclaimant Tsuburaya Productions Co., Ltd. (“TPC”), taken by UMC on May 11, 2017.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the Code of Conduct for United States Judges, downloaded from the U.S. Courts website, available at <http://www.uscourts.gov/judges-judgeships/code-conduct-united-states-judges#d>.

4. Attached hereto as Exhibit C is a true and correct copy of the Model Confidentiality Statement, Form AO-306, downloaded from the U.S. District Court for the Northern District of Illinois’s website, available at http://www.ilnd.uscourts.gov/_assets/_documents/_forms/_lca/modconf.pdf.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from *Maintaining the Public Trust: Ethics for Federal Judicial Law Clerks* (2d ed. 2011), a pamphlet authored by the Federal Judicial Center.

6. I have reviewed the Expert Report of Toshiaki Iimura dated March 20, 2017, served by TPC on March 20, 2017 pursuant to Fed. R. Civ. P. 26(a)(2). Judge Iimura’s expert report is substantively the same as his declaration [Dkt. 139] submitted by TPC in support of its motion for summary judgment. In neither his

1 expert report nor his declaration does Judge Iimura cite to any legal authority as a
2 basis for his opinions, except for opinions by Japanese courts previously issued in
3 this dispute.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed this 23rd day of June, 2017, at Los Angeles, California.

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8 /s/ Timothy Rawson
9 Timothy Rawson
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